

West Lake Landfill IAG and AOC Questions and Answers

EPA-USACE Inter-Agency Agreement:

1. What does the Inter-Agency Agreement (IAG) mean for the West Lake Landfill Superfund Site?

The IAG between EPA Region 7 and the United States Army Corps of Engineers (USACE) outlines the activities to be performed by USACE at the West Lake site prior to and during construction of the isolation barrier.

2. What activities does the IAG specify for the USACE to perform?

The IAG specifies four categories of work that the USACE will perform in support of EPA oversight of construction of the isolation barrier:

1. Technical Assistance
2. Design Review
3. Pre-Construction and Construction Observation
4. Community Relations Support

Technical assistance includes work efforts related to project initiation, management, and support.

Design review includes reviewing RP-prepared plans and specifications for the isolation barrier, as well as RP-prepared work plans associated with the actual construction of the isolation barrier. These reviews will focus on the completeness, correctness, safety, feasibility, and robustness of the work plans. The USACE will provide comments of their review to EPA.

Pre-Construction and Construction Observation includes observing preparation of waste staging, screening and segregation areas, water control, decontamination areas, and air monitoring areas. Pre-Construction observation will focus on adequacy of preparations, compliance with plans, and sequence of operations. During construction, daily observation will focus on compliance with approved work plans, sequence of operations, and any activities that may impact the effectiveness of the isolation barrier.

Community Relations includes attending Community Advisory Group meetings as requested by EPA, explaining USACE involvement at the project, and explaining USACE's evaluation of the isolation barrier design.

3. Will the USACE be the lead agency for oversight during construction of the isolation barrier?

No. EPA Region 7 remains the lead agency conducting oversight of work at the West Lake Landfill Superfund Site.

4. How long will the USACE be involved at the site?

The current IAG indicates that the work assignment period of performance is from April 15, 2014 to December 30, 2015.

5. Does the IAG encompass USACE oversight of work beyond pre-construction and construction activities related to the isolation barrier?

No. The current IAG is only for pre-construction and construction activities related to the proposed isolation barrier.

Administrative Order on Consent:

1. What does the AOC require of the Potentially Responsible Parties?

The AOC requires a series of pre-construction activities to take place at the West Lake Landfill to support the design, construction, and maintenance of the proposed isolation barrier. Specifically, the AOC requires the PRPs to:

1. Identify all areas proposed to be used for the storage/staging of excavated wastes;
2. Clear all vegetation and surface obstacles or impediments to the installation of an isolation barrier, and within the proposed storage/staging areas;
3. Remove or relocate all utilities, gas or leachate collection systems, air lines, and other features which may be an obstacle or impediment to the installation of an isolation barrier;
4. Develop a bird hazard mitigation and monitoring plan to ensure compliance with 10 CSR § 80-3.010(4)(B)1, 40 CFR § 258.10, and the terms of the Negative Easement and Declaration of Restrictive Covenants Agreement entered into by and between Bridgeton Landfill LLC, Rock Road Industries, Inc., Bridgeton Transfer Station, LLC, and the City of St. Louis, Missouri, dated April 6, 2005, and recorded on April 11, 2005, with the Recorder of Deeds for St. Louis County, Missouri as Document Number 245;
5. Develop an air monitoring and sampling plan to obtain background data and assess potential exposures in the community and demonstrate the effectiveness of any implemented control technologies; and
6. Install a mesh barrier inside the fenced area along St. Charles Rock Road for the purposes of minimizing and capturing on-Site, windblown solid waste during excavation activities.

2. When will activities begin at the site?

Within 30 days after of April 15, 2014, the PRPs will submit to EPA for approval a draft Work Plan for performing the work outlined in the AOC. The draft work plan will provide a description of, and an expeditious schedule for, the actions required by the AOC.